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Attorneys for Leroy “Lee” Codding

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SANTA ANA DIVISION**

In re:

NORTHERN HOLDING, LLC,

Debtor.

Case No. 8:20-bk-13014-ES

Chapter 7

**SIXTH STIPULATION RE:  
EXTENSION OF TIME FOR  
RESPONSIVE PLEADING FROM  
LEROY “LEE” CODDING TO MOTION  
FOR ISSUANCE OF ORDER TO SHOW  
CAUSE RE: CIVIL CONTEMPT**

**[MOTION DOCKET NO. 304]**

**[NO HEARING REQUIRED]**

**TO THE HONORABLE ERITHE A. SMITH, UNITED STATES  
BANKRUPTCUIY JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND  
ALL INTERESTED PARTIES:**

This stipulation is entered into between Richard A. Marshack, in his capacity as Chapter 7 Trustee (“Trustee”) of the Bankruptcy Estate (“Estate”) of Northern Holdings, LLC (“Debtor”), and Leroy “Lee” Codding (“Codding”) (together, the “Parties”), through undersigned counsel, regarding an extension of Codding’s deadline to file a response to Trustee’s Motion For An Order To Show Cause Re: Civil Contempt filed on April 1, 2022, as Docket No. 304.

**RECITALS**

A. On April 1, 2022, as Docket No. 304, Trustee filed a Motion For An Order To Show Cause Re: Civil Contempt against Codding (“Motion”). Under Local Bankruptcy Rule 2020-1(d), Codding had a seven-day period to file a response to the Motion.

B. On April 15, 2022, as Docket No. 308, the Parties filed a stipulation to extend Codding’s response deadline from April 8, 2022 to April 20, 2022 (“1<sup>st</sup> Stipulation”).

C. On April 8, 2022, as Docket No. 313, the Court entered an order approving the 1<sup>st</sup> Stipulation.

D. On April 19, 2022, as Docket No. 319, the Parties filed a second stipulation to extend Codding’s response deadline from April 20, 2022 to May 11, 2022 (“2<sup>nd</sup> Stipulation”).

E. On April 19, 2022, as Docket No. 320, the Court entered an order approving the 2<sup>nd</sup> Stipulation.

F. On May 6, 2022, as Docket No. 329, the Parties filed a third stipulation to extend Codding’s response deadline from May 11, 2022 to June 6, 2022 (“3<sup>rd</sup> Stipulation”).

G. On May 6, 2022, as Docket No. 330, the Court entered an order approving the 3<sup>rd</sup> Stipulation.

H. On June 6, 2022, as Docket No. 336, the Parties filed a fourth stipulation to extend Codding’s response deadline from June 6, 2022 to June 20, 2022 (“4<sup>th</sup> Stipulation”).

I. On June 6, 2022, as Docket No. 337, the Court entered an order approving the 4<sup>th</sup> Stipulation.

J. On June 16, 2022, as Docket No. 341, the Parties filed a fifth stipulation to extend Codding’s response deadline from June 20, 2022 to June 27, 2022 (“5<sup>th</sup> Stipulation”).

K. On June 21, 2022, as Docket No. 342, the Court entered an order approving the 5<sup>th</sup> Stipulation.

**STIPULATION**

The Parties agree and stipulate as follows:

1. Codding shall have a further extended period to file a response or opposition to the Motion, through June 29, 2022, without prejudice to further stipulated extensions.

2. The Parties jointly request that no order be entered on the Motion prior to June 29, 2022.

3. This stipulation may be executed in one or more counterparts and facsimile or electronic signatures may be used in filing this document with the Court.

Dated: June 23, 2022

Respectfully submitted by

**GOE FORSYTHE & HODGES LLP**

By: /s/ Robert P. Goe

Robert P. Goe

Brandon J. Iskander

Attorneys for Respondent Leroy "Lee"  
Coddling

Dated: June 23 2022

**MARSHACK HAYS LLP**

By: 

D. Edward Hays

Tinho Mang

Attorneys for Chapter 7 Trustee Richard  
A. Marshack

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 18101 Von Karman Avenue, Suite 1200, Irvine, CA 92612

A true and correct copy of the foregoing document entitled (*specify*): **SIXTH STIPULATION RE: EXTENSION OF TIME FOR RESPONSIVE PLEADING FROM LEROY "LEE" CODDING TO MOTION FOR ISSUANCE OF ORDER TO SHOW CAUSE RE: CIVIL CONTEMPT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) June 23, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) June 23, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows: Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** (*state the method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) June 23, 2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows: Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

- The Honorable Erithe A. Smith, USBC, 411 West Fourth Street, Santa Ana, CA 92701
- (SUSPENDED DUE TO COVID-19 PROTOCOLS)

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 23, 2022  
Date

Susan C. Stein  
Printed Name

/s/Susan C. Stein  
Signature

## Mailing Information for Case 8:20-bk-13014-ES

### Electronic Mail Notice List

The following is the list of parties who are currently on the list to receive email notice/service for this case.

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